

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

E & G, INC., a West Virginia corporation,)	
individually and as the representative of a)	
class of similarly-situated persons,)	
)	
Plaintiff,)	Civil Action No. 6:17-cv-00318-TMC
)	
v.)	CLASS ACTION
)	
MOUNT VERNON MILLS, INC., and)	
JOHN DOES 1-5,)	
)	
Defendants.)	

PLAINTIFF’S CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff, E&G, INC. (“Plaintiff”), by and through its attorneys, and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), and Local Rule 6.01, respectfully request this Court to extend the time for Plaintiff to file its Response in opposition to Defendant’s Motion for Summary Judgment to November 1, 2019. In support of thereof, Plaintiff states as follows:

1. On September 13, 2019, Defendant filed its Motion for Summary Judgment. (Doc. 123).
2. On September 25, 2019, this Court extended the time for Plaintiff to respond to Defendant’s Motion for Summary Judgment to October 11, 2019. (Doc. 129).
3. Under Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, the Court may extend a deadline for good cause when a request is made before the original deadline expires.
4. Plaintiff requests a 21-day extension to November 1, 2019 to file its Response in opposition to Defendant’s Motion for Summary Judgment. Good cause exists for the requested extension as the parties have scheduled a mediation with William B. ‘Kip’ Darwin, Jr. on October 18, 2019 in Greenville, SC. Plaintiff seeks an attempt to settle this matter before

expending additional time litigating this matter.

5. This is the second extension Plaintiff has requested to respond to Defendant's Motion for Summary Judgment.

6. On October 2, 2019, Defendant's counsel stated that he consents to the relief requested in this motion.

WHEREFORE, Plaintiff, E&G, INC., respectfully request this Court to enter order extending the time for Plaintiff to file its Response in opposition to Defendant's Motion for Summary Judgment to November 1, 2019, and for any such further relief that this Court deems appropriate.

Respectfully submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record and I hereby certify that the foregoing document or paper will be served on all attorneys of record.

s/ John G. Felder, Jr. _____